

DECLARATION OF PATRICK F. MADDEN

I, Patrick F. Madden, declare and state as follows:

1. I am an attorney at Berger & Montague, P.C., Co-Lead Counsel for the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury in the above-captioned matter. I am a member in good standing of the State Bar of Pennsylvania, and have been admitted to this Court *pro hac vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them.

2. I make this declaration in support of the Parties' Joint Agreed Motion For Leave To File Class Certification Briefs In Excess Of Page Limits Imposed By Local Rule II 7-3.

3. On October 2, 2017 the Parties met and conferred and agreed to seek leave from this Court to extend the page limits for upcoming class certification briefing.

4. To date, there are over 500 docket entries in this case. The operative complaint contains nearly 60 pages of allegations. Plaintiffs' Opening Expert Reports contain approximately 550 pages of expert opinion, and the Parties are exchanging two additional rounds of expert reports in the coming months.

5. The Parties seek leave from the Court to exceed the page limits set by the Local Rules:

Brief	Current Limit	Agreed Increase	Proposed Limit
Plaintiffs' Motion for Class Certification	24 pages	11 pages	35 pages
Zuffa's Opposition to Motion for Class Certification	24 pages	16 pages	40 pages
Plaintiffs' Reply in Support of Class Certification	12 pages	13 pages	25 pages

I declare under penalty of perjury that the foregoing is true and correct and this Declaration is executed in Philadelphia, Pennsylvania on November 13, 2017.

By: *Patrick F. Madden*

Patrick F. Madden